

allow defendant to review the late discovery recently submitted by the government.

See Securities and Exchange Commission v. Pentagon Capital Management, PLS, second circuit 2013, Docket 12-1680, Decided 8/8/13.

Defendant has not had an opportunity to review the discovery presented by the government and she has concentrated on getting other responses in and focusing on newly discovered material that would prove the defendant's innocence.

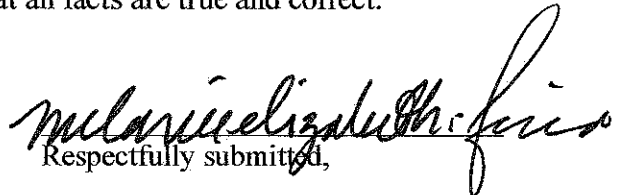
Defendant **again** moves for a 90-day continuance of trial in order to review the late discovery and prepare any motions necessary.

JURAT

Under penalty of perjury, pursuant to 28 USC section 1746, I declare that I have reviewed the motion presented herein, and that all facts are true and correct.

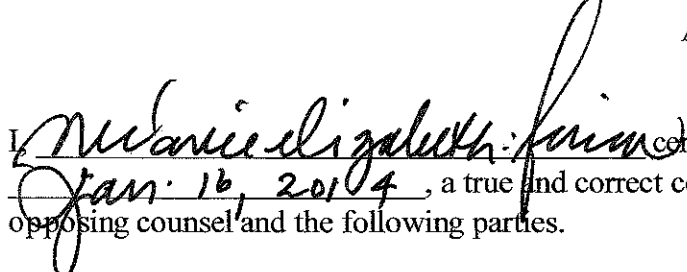
Dated:

Jan. 16, 2014


Respectfully submitted,

Melanie elizabeth: ferreira

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I,  certify that on this 16th day of Jan. 16, 2014, a true and correct copy of the foregoing was served on opposing counsel and the following parties.

Honorable Kathy Seibel
300 Quarropas Street
White Plains, NY 10601

U.S. Attorney for the Southern District of NY
Jason P.W. Halperin
300 Quarropas Street
White Plains, NY 10601

EXHIBIT A

From: "Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>
Subject: **Additonal Discovery**
Date: January 15, 2014 4:34:42 PM EST
To: "mferreira8@optonline.net" <mferreira8@optonline.net>
Cc: "margaretshalley@aol.com" <margaretshalley@aol.com>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>, "Halperin, Jason (USANYS)" <Jason.Halperin@usdoj.gov>
1 Attachment, 133 KB

Dear Ms. Ferreira:

Attached please find records from Ulster Bank marked 11804 through 11808 received by the Government today. Thank you.

Regards,
Susan Giordano
Paralegal



add Ulster B....pdf (133 KB)

EXHIBIT B

"Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>

Additional Documents

January 15, 2014 3:11:34 PM EST

"mferreira8@optonline.net" <mferreira8@optonline.net>

"margaretshailey@aol.com" <margaretshailey@aol.com>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>, "Halperin, Jason (USANYS)" <Jason.Halperin@usdoj.gov>

1 Attachment, 222 KB

Dear Ms. Ferreira:

Attached are records the Government received today from Wilton Bank marked 11801 through 11803. Thank you.

Regards,
Susan Giordano
Paralegal


NORMANCH ydf (222 KB)

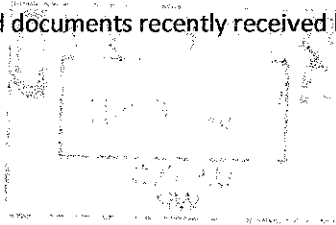
EXHIBIT C

From: "Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>
Subject: **US v Melanie Ferreira - Additional documents**
Date: January 15, 2014 12:08:49 PM EST
To: "mferreira8@optonline.net" <mferreira8@optonline.net>
Cc: "margaretshalley@aol.com" <margaretshalley@aol.com>, "Halperin, Jason (USANYS)" <Jason.Halperin@usdoj.gov>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>
2 Attachments, 286 KB

Dear Ms. Ferreira:

Attached please find documents recently received by the Government marked 11794 through 11800. Thank you.

Regards,
Susan Giordano
Paralegal



Wilton Bk docs.pdf (78.8 KB) Nebraska DMV.pdf (207 KB)